

SUPPORTING STATEMENT

FOR

National Automotive Sampling System Law Enforcement Information

OMB Control Number 2127-XXXX

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information, necessary. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.

The National Highway Traffic Safety Administration's (NHTSA) National Automotive Sampling System (NASS) collects crash data on a nationally representative sample of police-reported traffic crashes and related injuries. NASS data are used by government, industry, and academia in the US and around the world to make informed highway safety decisions.

Designed in the 1970's, NASS has never been fully implemented to collect data from the originally planned 75 data collection sites, also called Primary Sampling Units or PSUs. At the same time, the data needs of the transportation community have increased and significantly changed over the last three decades. Recognizing the importance as well as the limitations of the current NASS system, NHTSA is undertaking a modernization effort to upgrade its data systems by improving the information technology (IT) infrastructure, updating the data collected and reexamining the NASS sample sites and sample size.

The United States Congress supports the effort to examine the deficiencies in NASS and to plan for a modernized and comprehensive data system. United States Senate Report #112-83 (Attachment 2) and House Report #111-564 (Attachment 3) direct NHTSA to evaluate the NASS CDS data collection program. The reports advise NHTSA to provide to the House and Senate Committee on Appropriations a review of the NASS modernization efforts. NHTSA is undertaking a modernization effort to upgrade its data systems by updating the data collected and reexamining the NASS sample sites and sample size.

The new sample design has three stages. The first stage selects geographic locations around the country, the second stage selects law enforcement agencies within the geographic areas, and the third stage samples Police Accident Reports (PARs). Using updated population and other auxiliary information, NHTSA has identified a new set of probabilistically selected geographic locations around the country that are expected to

provide a more accurate traffic safety picture, more precise estimates, and greater insight into new and emerging data needs.

This collection of information will assist NHTSA with the next step in updating the NASS sample design, which is to select a fresh sample of law enforcement agencies within these Primary Sampling Units (PSUs). This requires compiling basic crash count data from every law enforcement agency that responds to motor vehicle crashes in the PSUs. This data would be used to construct a measure of size in order to make informed and efficient choices in the probabilistic selection of the second stage sample units, the law enforcement agencies. It is this need to make informed and efficient choices in the NASS redesign that makes the proposed collection necessary.

1. Indicate how, by whom, and for what purpose the information is to be used. Indicate the actual use the agency has made of the information received from the current collection.

The data collected from Law Enforcement Agencies will be used by NHTSA and Westat, Inc.¹ to create a sampling frame of Law Enforcement Agencies (LEA) within the selected PSUs and to form a measure of size with which to select a probability proportional to size (PPS) sample of Law Enforcement Agencies. It is for the sole purpose of selecting an informed and efficient LEA sample that NHTSA plans to use the data. We have no intention to publish any estimates from the information collected.

NHTSA has not conducted such a collection in 30 years, when the original NASS sites were selected. There is no current collection underway.

2. Describe whether, or to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Data would be collected via in-person or telephone interviews with Law Enforcement Agencies. Responses would be typed into fillable PDF (Portable Document Format) files on existing laptop and desktop computers at NHTSA's regional offices, or recorded on paper forms.

3. Describe efforts to identify duplication. Show why any similar information already available cannot be used or modified.

¹ NHTSA has contracted Westat, Inc. of Rockville, Maryland to recommend and implement the sample design for the new NASS, including the selection of the law enforcement agencies to be used for the new sample.

We have conducted extensive research to uncover this information from available sources in an effort to avoid unnecessary burden and duplicated effort. We searched our own databases and records, including those at our regional offices, and conducted internet research for publicly available information. In all cases we were either unable to find crash counts at the granular level required for the sample design (namely, at the level of the Law Enforcement Agencies) or the information we found was out of date.

4. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Some of the Law Enforcement Agencies we may need to contact for information will meet OMB's guidance of what constitutes a "small entity" in that they are government agencies with jurisdiction over areas in which less than 50,000 people live. As we only seek six crash counts (regardless of the size of the LEA), we feel the burden to be relatively small and have not been able to identify ways in which to reduce the burden further.

5. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently.

We are requesting this one-time collection in order to make informed choices in the NASS redesign. Obtaining crash counts for the Law Enforcement Agencies in the selected PSUs will allow us (through the construction of a statistical measure of size) to select Law Enforcement Agencies that are both nationally representative and meet current and anticipated data needs. Without the sought information, we would need to select Law Enforcement Agencies through other methods, such as simple random sampling², which is not as efficient for selecting the second stage sample units. With Congress allocating \$25 million to the redesign effort and as the sample we select now will be used in regulations and the design of automotive technologies for years to come, collecting data that will allow us to make informed design choices seems the most prudent course of action.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with the guidelines set forth in CFR 1320.6.

The procedures specified for this information collection are consistent with the guidelines set forth in 5 CFR 1320.6.

² Alternatively we could impute crash counts for Law Enforcement Agencies for which data is not available from other sources, but in our view this would still leave an inappropriate degree of uninformed selection in the LEA sample, considering how long and for what purposes the new NASS will be used.

8. Provide a copy of the Federal Register document soliciting comments on extending the collection of information, a summary of all public comments responding to the notice, and a description of the agency's actions in response to the comments. Describe efforts to consult with persons outside the agency to obtain their views.

The Federal Register Notice soliciting comments on the new collection is attached. We did not receive any public comments.

9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift will be provided to any respondent.

10. Describe any assurance of confidentiality provided to respondents.

We will not be collecting any confidential information. We will be collecting the name of the Law Enforcement Agency and the number of various types of crashes reported by the agency. Please see the data collection form in Attachment 1 for the complete list of what we will collect.

11. Provide additional justification for questions on matters that are commonly considered private.

No data will be obtained that is commonly considered private.

12. Provide estimates of the hour burden of the collection of information on the respondents.

The respondents for this collection (Law Enforcement Agencies) will be usually providing information that is contained within existing records, and so we estimate the burden to be on average 2 hours per respondent. Estimating that we will need to contact about 1,450 such agencies,³ we arrive at a total burden hour figure of 2,900 person-hours.

ESTIMATED REPORTING BURDEN HOURS		
Law Enforcement	Average Number of Hours	Burden Hours

³ Please see the first answer in Part B for a detailed derivation of the 1,450 figure.

Agency (A)	(B)	(A)*(B)
1,450	2	2,900

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no additional costs to respondents or recordkeepers. Estimating a labor cost of \$30 per hour for Law Enforcement Agency personnel puts the total cost burden of this one-time collection at \$87,000.

ESTIMATED REPORTING BURDEN COST	
TOTAL BURDEN HOURS (A)	2,900
AVERAGE COST PER HOUR (B)	\$30
COST ASSOCIATED WITH BURDEN HOURS (A)*(B)	\$87,000

14. Provide estimates of annualized costs to the Federal government.

The data for this one-time collection would be collected using existing agency staff and Law Enforcement Liaisons already under contract to NHTSA as part of their normal work duties. The fully loaded labor rate for the Liaisons is about \$40-65 per hour. Thus the collection of this data would come at a one-time cost to the Federal government of about \$116,000 - \$188,500. (We arrived at these figures by multiplying the estimated 2,900 burden hours by the labor rate of \$40-65 per hour.)

15. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-I.

The evaluation of the NASS CDS data collection program has created a program change of adding 2,900 burden hours to NHTSA's overall total.

16. For collections of information whose results will be published, outline plans for tabulation and publication.

NHTSA will not publish the information from this collection.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

Approval to not display the expiration date is not requested.

18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

No exceptions requested.